ity Light

# Memorandum



DATE April 15, 1980

TO Bill Riley

Pamela Anderson FROM

SUBJECT: P.C.B. PRESENTATION BY GENERAL ELECTRIC

Presenters: Bob Lowenstein - Repair Center - Kent

Herb West - Northwest Transformer Engineer

Ed Firstein - Slide Show Creator

### Is It A P.C.B. Transformer?

YES .... IF : (1) nameplate says ASKAREL.

(2) liquid known to have 500 ppm or above.

(3) no nameplate/no records of unit's fluid.... consider P.C.B. until proven otherwise.

## To Test Or Not to Test Transformer Is Owner's Option.

There are no restrictions on continued use of well-functioning P.C.B. transformer.

#### But:

It can never be untanked.

Can untank suspect transformer if it has never been tested. If you test liquid in the transformer, you take "right to assume" away from yourself.

Therefore: Test liquid which is removed from transformer.

It remains a serious financial question. If you test liquid in the transformer, you remove your right to ever rebuild or service transformer.

## Retrofilling.

As yet, unsatisfactory. Transformer can not be adequately cleaned up after one fluid refill. GE working on procedures; perhaps satisfactory retrofilling in six (6) months- one year.

## Two key questions:

Should utility test for classification? (1) Answer: "not now"

Should utility consider P.C.B. extraction: Answer : "later"

## Problems in proving P.C.B. contamination liability:

- Is new transformer contaminated by test oil?
- (2) How clean is oil purchased to fill?
- Question of contamination by utility pumping and storage equipment.

Puget Power has made statement that it plans to test all transformers within the year.

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Legal Problem : Question of OIL TITLE

Utility responsible for all of their oil <u>permanently</u> unless specified otherwise in disposer's contract.

Therefore - any spill/accidents/mishaps which occur in transport remain utility's responsibility.

PA:kp

cc: Bill Riley
P. Anderson
OEA (3)